

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, *et al.*

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*

Defendants.

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

**STATE DEFENDANTS' MOTION FOR
LEAVE TO FILE MATTERS UNDER SEAL**

State Defendants move this Court to seal the investigative summaries filed at [Doc. 1449]. The Court instructed State Defendants to file investigative summaries which have been produced to Plaintiffs' counsel in discovery. State Defendants marked those produced investigative summaries as confidential under the terms of the protective order in this case. That designation was applied for two reasons. First, administrative enforcement proceedings in these matters, in large part, remain pending following the SEB's decision to bind the matters over to the Attorney General. Second, several of the investigative summaries contain PII of complainants and/or respondents. Consequently, good cause exists to seal the discovery documents

filed at [Doc. 1449], consistent with the terms of the protective order in this case.

State Defendants attach a proposed order sealing that filing herewith.

Respectfully submitted this 5th day of August 2022.

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CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing **STATE DEFENDANTS' MOTION FOR LEAVE TO FILE MATTERS UNDER SEAL** was prepared double-spaced in 13-point Century Schoolbook pursuant to Local Rule 5.1(C).

/s/ Vincent R. Russo
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